

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Sharon Yvonne Ross,

Plaintiff,

vs.

Billy R. Oswald; Oswald & Burnside, LLC;
Billy R. Oswald Law Firm, LLC; and Oswald
Realty Inc.;

Defendants,

C/A No.: 3:22-cv-03043-MGL-PJG

**PLAINTIFF'S RESPONSES TO LOCAL
RULE 26.01 (D.S.C) INTERROGATORIES**

The following constitute the Plaintiff's responses to the interrogatories contained in Rule 26.01 of the Local Civil Rules (D.S.C) for the United States District Court for the District of South Carolina.

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Plaintiff is not aware of any person or legal entity which may have subrogation interest in the Plaintiff's claim. However, Plaintiff reserves the right to amend this response if it later discovers the existence of such an interest.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Plaintiff is entitled to have all their claims tried by a jury because this right is provided by statute or common law.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Plaintiff is an individual not a company or corporation.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This matter is properly in the Columbia Division, as all acts or omissions giving rise to the claims set forth in Plaintiff's Complaint occurred in the District of South Carolina, Columbia Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any case which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: This action is not related, in whole or in part, to any other matter filed in this district.

Respectfully submitted,

BURNETTE SHUTT & McDANIEL, PA

s/ Jack E. Cohoon

Jack E. Cohoon (Bar No. 9995)
912 Lady Street, Second Floor
PO Box 1929
Columbia, South Carolina 29202
Telephone: (803) 904-7914
Fax: (803) 904-7910
jcohoon@burnetteshutt.law

ATTORNEY FOR PLAINTIFF

Columbia, South Carolina
September 9, 2022